

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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ALLSTATE INSURANCE COMPANY; ALLSTATE	:	NO. 5:16-cv-04276-EGS
INDEMNITY COMPANY; ALLSTATE PROPERTY &	:	
CASUALTY INSURANCE COMPANY; ALLSTATE	:	
VEHICLE & PROPERTY INSURANCE COMPANY	:	
	:	
	:	
v.	:	JURY TRIAL DEMANDED
ELECTROLUX HOME PRODUCTS, INC.	:	

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**DEFENDANT ELECTROLUX HOME PRODUCTS, INC.’S  
MOTION FOR BIFURCATION**

Defendant Electrolux Home Products, Inc. (“Electrolux”), by and through its counsel, Nicholson Law Group LLC, files the within Motion for Bifurcation, and avers as follows:

1. Electrolux hereby moves this Honorable Court for entry of an Order separating trial of Allstate’s claim for punitive damages from the remaining issues in this case.
2. In support thereof, Electrolux simultaneously files herewith and incorporates herein by reference its supporting Memorandum of Law.

Respectfully submitted,

NICOLSON LAW GROUP LLC

BY: /s/ Melissa L. Yemma  
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*Attorneys for Defendant Electrolux Home  
Products, Inc.*

DATE: January 8, 2019

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ELECTROLUX HOME PRODUCTS, INC.	:	

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Defendant Electrolux Home Products, Inc.'s Motion for Bifurcation was served electronically on the date stated below, upon the following:

Raymond E. Mack, Esquire  
Patrick A. Hughes, Esquire  
de Luca Levine, LLC  
Three Valley Square  
512 E. Township Line Road, Suite 220  
Blue Bell, PA 19422

Respectfully submitted,

NICOLSON LAW GROUP LLC

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*Attorneys for Defendant Electrolux Home  
Products, Inc.*

DATE: January 8, 2019